

DIRECTORS
JOSEPH G. DAMAS, JR.
President
JIM GUNTHER
ARTHUR LAMPERT
TIM ROLLISSON

JOHN H. WEED

P.O. BOX 5110 • 43885 SOUTH GRIMMER BOULEVARD, FREMONT, CALIFORNIA 94537 PHONE (510) 659-1970 • FAX (510) 770-1793 • E-MAIL acwd@infolane.com

OFFICERS
PAUL PIRAINO
General Manager
MARVELL L. HERREN
District Secretary

February 25, 1999

Confirmation of fax sent February 25, 1999

Mr. Lester Snow Program Director CALFED Bay-Delta Program 1416 Ninth Street, Suite 1155 Sacramento, CA 95814

Dear Mr. Snow,

Subject: Comments on the Stakeholder Proposals for Certification of Compliance with the

Urban MOU

Alameda County Water District (ACWD) is pleased to have the opportunity to comment on the stakeholder proposals for certification of compliance with the urban MOU as part of the CALFED Water Use Efficiency Program.

Either of the two approaches to water conservation certification will require that urban water agencies be subject to a new regulatory framework, complete with fines and other penalties for enforcement. CALFED is proposing to use water conservation certification as an "assurance" that water is being used efficiently prior to new storage or other facilities being developed. However, CALFED also needs to provide urban agencies assurances that if they meet certification requirements, they will receive significant and measurable improvements to water quality and water supply reliability from Delta water supplies. Without such assurances, urban agencies would be subject to new regulations and reporting requirements without any guarantees of receiving CALFED benefits.

Thank you for the opportunity to comment on the certification proposals for CALFED's Water Use Efficiency Program. We look forward to receiving additional information on this effort as it is developed by CALFED.

Very truly yours,

Paul Piraino

General Manager

ec

By fax